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March 29, 2021

Via Email

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Daniel Daniel*, 20Cr101

Dear Judge Preska:

Yusuf Elashmawy and I are the CJA appointed counsels for Daniel Daniel and write this letter with the consent of the Government to request an adjournment of Mr. Daniel's upcoming sentencing hearing that is scheduled for April 6th at 10 am. After consulting with the Court's Clerk, I understand that October 4, 2022 at 10 am or a date thereafter is available on the Court's calendar for this purpose.

As previously discussed, Mr. Daniel suffers from a number of chronic medical conditions that require immediate and on-going treatment, particularly a degenerative eye condition and obstructive coronary artery disease. In our continued conversations with his medical team, we were advised that Mr. Daniel had a medical setback related to his degenerative ocular condition. In fact, a troublesome infection to his eye socket reemerged and a corrective surgery is scheduled for June 23rd. His medical team suggested that specialized monthly follow up treatments would be necessary for at least 6 months after this procedure.

Given these facts and the potential sentence in this matter, as well as Mr. Daniels' likely deportation, we are asking the Court to grant this adjournment to allow Mr. Daniel to complete his medial treatment in advance of his sentencing hearing.

Thank you in advance for any and all consideration of this request. We will await further instructions from the Court on this matter.

Respectfully submitted,

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

Angus James Bell
Angus James Bell, Esq.

3/29/22